

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

EMILY BRUNNER and CAITLIN  
TUROWSKI, individually and on behalf of all  
persons similarly situated, as Class/Collective  
representatives,

Plaintiffs,

v.

JAMES JOHN LIAUTAUD, JIMMY JOHN'S,  
LLC, JIMMY JOHN'S ENTERPRISES, LLC,  
JS FORT GROUP, INC., JJ SEVERSON  
AFFILIATES FIVE, INC., JJ SEVERSON  
AFFILIATES, INC., JIMMY JOHN'S  
FRANCHISE, LLC, JEFFREY S. FORT,  
TODD SEVERSON, and BROOKE  
SEVERSON,

Defendants.

Case No. 1:14-cv-05509

Honorable Charles P. Kocoras

Magistrate Judge Jeffrey Cole

**AGREED MOTION FOR ENTRY OF PROPOSED AGREED PROTECTIVE ORDER**

Defendants Jimmy John's, LLC, Jimmy John's Enterprises, LLC, and Jimmy John's Franchise, LLC (collectively, "Jimmy John's"), by their attorneys and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, respectfully moves the Court for the entry of the proposed Agreed Protective Order. In support of this motion, Defendants state as follows:

1. The Parties anticipate producing various documents and information in this proceeding of a confidential nature, including competitively sensitive information about Defendants' policies, and personal information regarding current and/or former employees. These documents may be relevant to the subject matter of this case.

2. Defendants treat this information as confidential. Defendants also limit access to this information because the documents contain information inappropriate for distribution to third parties.

3. The proposed Agreed Protective Order permits Defendants' and Plaintiffs' respective counsel to review and use the confidential information with their respective clients and certain non-party witnesses, so long as these individuals review and agree not to disclose the confidential information for purposes outside the scope of this litigation.

4. On May 1, 2015, Plaintiffs' counsel informed Defendants' counsel that the terms of the proposed Agreed Protective Order are acceptable, and that they have no objections to Defendants' Motion for Entry of Proposed Agreed Protective Order.

WHEREFORE, Defendants Jimmy John's, LLC, Jimmy John's Enterprises, LLC, and Jimmy John's Franchise, LLC, respectfully request that the Court grant this motion and enter the proposed Agreed Protective Order.

**DATED: May 1, 2015**

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Respectfully submitted

JIMMY JOHN'S, LLC  
JIMMY JOHN'S ENTERPRISES, LLC  
JIMMY JOHN'S FRANCHISE, LLC

By: s/Gerald L. Maatman, Jr.  
One of Their Attorneys

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1st day of May 2015, I electronically filed the foregoing **Agreed Motion For Entry Of Proposed Agreed Protective Order** with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record, including the following:

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/s/ Gerald L. Maatman, Jr.  
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